

LETTERS OF REQUEST AND JUDGMENT

CANADA

SUPERIOR

COURT

PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

NO.: 500-17-005908-057

IN THE MATTER OF:

TELEGLOBE COMMUNICATIONS
CORPORATION, TELEGLOBE
USA INC., OPTEL
TELECOMMUNICATIONS, INC.,
TELEGLOBE HOLDINGS (US)
CORPORATION, TELEGLOBE
MARINE (US) INC., TELEGLOBE
HOLDING CORP., TELEGLOBE
TELECOM CORPORATION,
TELEGLOBE INVESTMENT
CORP., TELEGLOBE
LUXEMBOURG LLC, TELEGLOBE
PUERTO RICO INC., and
TELEGLOBE SUBMARINE INC.

Debtors

TELEGLOBE COMMUNICATIONS
CORPORATION, a legal person
having a place of business at 11495
Commerce Park Drive, Reston,
Virginia, 20191;

-and-

TELEGLOBE USA INC., a legal
person having a place of business at
11495 Commerce Park Drive,
Reston, Virginia, 20191;

-and-

OPTEL TELECOMMUNICATIONS,
INC., a legal person having a place
of business at 11495 Commerce Park
Drive, Reston, Virginia, 20191;

-and-

TELEGLOBE HOLDINGS (US)
CORPORATION, a legal person
having a place of business at 11495
Commerce Park Drive, Reston,
Virginia, 20191;

-and-

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TELEGLOBE MARINE (US) INC.,
a legal person having a place of
business at 11495 Commerce Park
Drive, Reston, Virginia, 20191;

-and-

TELEGLOBE HOLDING CORP., a
legal person having a place of
business at 11495 Commerce Park
Drive, Reston, Virginia, 20191;

-and-

**TELEGLOBE TELECOM
CORPORATION**, a legal person
having a place of business at 11495
Commerce Park Drive, Reston,
Virginia, 20191;

-and-

TELEGLOBE INVESTMENT CORP.,
a legal person having a place of
business at 11495 Commerce Park
Drive, Reston, Virginia, 20191;

-and-

TELEGLOBE LUXEMBOURG LLC,
a legal person having a place of
business at 11495 Commerce Park
Drive, Reston, Virginia, 20191;

-and-

TELEGLOBE PUERTO RICO INC.,
a legal person having a place of
business at 11495 Commerce Park
Drive, Reston, Virginia, 20191;

-and-

TELEGLOBE SUBMARINE INC., a
legal person having a place of
business at 11495 Commerce Park
Drive, Reston, Virginia, 20191;

-and-

**THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF
TELEGLOBE COMMUNICATIONS
CORPORATION, et al.**, c/o Messrs.
Hahn & Hessen LLP, 488 Madison
Avenue, New York, New York 10022;

Plaintiffs

-v.-

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BCE INC., a legal person having its principal place of business at 1000 de la Gauchetière West, suite 3700, Montreal, Quebec, H3B 4Y7;

-and-

MICHAEL T. BOYCHUK, domiciled and residing at 14 Magnolia, Baie d'Urfe, Quebec, H9X 3P4;

-and-

MARC A. BOUCHARD, domiciled and residing at 2878 Jean Gascon, St.-Laurent, Quebec, H4R 2T4;

-and-

SERGE FORTIN, domiciled and residing at 1020 Boulevard l'Assomption, Repentigny, Quebec, J6A 5H5;

-and-

TERENCE J. JARMAN, domiciled and residing at 2878 Jean Gascon, St.-Laurent, Quebec, H4R 2T4;

-and-

STEWART VERGE, domiciled and residing at 5 Edgehill Road, Toronto, Ontario, M9A 4N1;

-and-

JEAN C. MONTY, domiciled and residing at 1321 Sherbrooke Street West, Montreal, Quebec, H3G 1J4;

-and-

RICHARD J. CURRIE, domiciled and residing at 46A Chestnut Park Road, Toronto, Ontario;

-and-

THOMAS KIERANS, domiciled and residing at 4 Woodland Heights, Toronto, Ontario, M5S 1W8;

-and-

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STEPHEN P. SKINNER, domiciled
and residing at 50 Maxwell, Baie
d'Urfe, Quebec;

-and-

ARNOLD STEINBERG, domiciled
and residing at 4931 Glencairn
Avenue, Montreal, Quebec, H3B 4Y7;

Defendants

**MOTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
OF TELEGLOBE COMMUNICATIONS CORPORATION, et al. FOR AN
ORDER TO APPEAR FOR EXAMINATION AND TO PRODUCE DOCUMENTS**

(Art. 9 and following of the *Special Procedure Act*, R.S.Q., c. P-27)

**TO ONE OF THE HONOURABLE JUDGES OF THE SUPERIOR COURT,
SITTING IN CHAMBERS, IN AND FOR THE DISTRICT OF MONTREAL,
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF
TELEGLOBE COMMUNICATIONS CORPORATION, ET AL. RESPECTFULLY
STATES AS FOLLOWS:**

- 1. THAT** by Order rendered on May 19, 2005 (the "Order"), the Honorable Sue L. Robinson, Chief Judge of the United States District Court, for the District of Delaware, granted a Motion filed by the Official Committee of Unsecured Creditors of Telelobe Communications Corporation, et al. (the "Committee") seeking issuance of, *inter alia*, a Letter of Request to obtain the assistance of this Honourable Court in order to obtain the deposition and production of documents from Claude Seguin (the "Witness"), and issued a Letter of Request addressed to this Honourable Court, a certified copy of the Order and Letter of Request is produced herewith as **Exhibit P-1**;
- 2. THAT** the Letter of Request relates to proceedings instituted by Plaintiffs (including the Committee) against Defendants, the whole as appears therefrom;
- 3. THAT** the Letter of Request (Exhibit P-1) requests an Order of this Honourable Court to summon the Witness to appear before this Honourable Court or before a duly appointed person capable of administering an oath to give testimony by questions and answers upon oral deposition and to produce the documents identified and set forth in Schedule "A" of the Letter of Request;
- 4.** The Witness' last known address is his business address at Groupe CGI Inc., 1350 Rene-Levesque Boulevard West, in the City of Montreal, Province of Quebec, and is therefore within the jurisdiction of this Honourable Court;
- 5. THAT** it is in the interest of justice that this Honourable Court issue the orders sought by the Letter of Request;
- 6. THAT** the undersigned attorneys have undertaken to furnish the amounts necessary to ensure payment of witness fees, travel expenses, and other fees or

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payments that may be payable to the Witness under the laws of Quebec as a result of the present Motion;

7. **THAT** the present Motion is well-founded in fact and in law;

WHEREFORE, THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF TELEGLOBE COMMUNICATIONS CORPORATION, ET AL. PRAYS FOR JUDGMENT OF THIS HONOURABLE COURT:

GRANTING the present Motion;

ORDERING Claude Seguin (the "Witness") to appear before a duly appointed person capable of administering oaths or affirmations to give testimony by questions and answers upon oral deposition, at the offices of Kugler Kandestin, L.L.P., 1 Place Ville-Marie, Suite 2100, Montreal, Quebec, H3B 2C6, commencing at 9:30 a.m. on June 29, 2005 and/or on such other date that the Official Committee of Unsecured Creditors of Teleglobe Communications Corporation, et al. (the "Committee") and the Witness may agree and/or on such other date as the Court may otherwise fix (the "Deposition Date"), that such deposition continue from day to day until completed; and that the Witness receive from the Committee whatever witness fees, travel expenses, and other fees or payments may be payable to witnesses under the laws of Quebec (the "Witness Indemnity");

ORDERING that the delivery by the undersigned attorneys of a copy of the judgment to be rendered herein by Federal Express, addressed to John P. Amato, of Hahn & Hessen LLP, 488 Madison Avenue, New York, New York 10022, and George J. Wade and Daniel Schimmel, of Shearman & Sterling LLP, 599 Lexington Avenue, New York, New York 10022-6069, not less than thirty (30) days prior to the Deposition Date, shall constitute the advance notice pursuant to the Letter of Request (Exhibit P-1);

ORDERING that John P. Amato, of Hahn & Hessen LLP, 488 Madison Avenue, New York, New York 10022, Gregory V. Varallo, of Richards, Layton & Finger, P.O. Box 551, Wilmington, Delaware 19899, co-counsel for Plaintiffs, and George J. Wade and Daniel Schimmel, of Shearman & Sterling LLP, 599 Lexington Avenue, New York, New York 10022-6069, counsel for Defendants, as well as any other attorneys of the said law firms assisting the foregoing attorneys, be permitted to attend at and participate in the deposition;

ORDERING that a stenographic written record be made of the deposition by an official court reporter, and that the deposition be videotaped by a competent professional;

ORDERING the Witness to produce and deliver copies of the documents specified in Schedule "A" of the Letter of Request (Exhibit P-1) to Hahn & Hessen LLP, c/o Me Gordon Levine, Kugler Kandestin, L.L.P., 1 Place Ville-Marie, Suite 2100, Montreal, Quebec, H3B 2C6, no less than twenty-five (25) business days prior to the Deposition Date;

ORDERING that a copy of the deposition transcript, with all exhibits marked and attested, be returned to John P. Amato, Esq., Hahn & Hessen LLP, 488 Madison Avenue, New York, New York 10022, United States of America, under

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cover duly sealed and addressed to the Clerk of the United States District Court for the District of Delaware for return thereto;

GIVING ACTE to the undertaking from the undersigned attorneys to pay, on behalf of the Committee, the Witness Indemnity to the Witness;

ORDERING the provisional execution of the judgment to be rendered herein notwithstanding appeal;

THE WHOLE WITHOUT COSTS, SAVE IN THE EVENT OF CONTESTATION.

Montreal, May 25, 2005

(s) KUGLER KANDESTIN, L.L.P.

KUGLER KANDESTIN, L.L.P.
Attorneys for Plaintiff Official Committee
of Unsecured Creditors of Teleglobe
Communications Corporation et al.

TRUE COPY

Kugler Kandestin, L.L.P.
Attorneys for Plaintiff Official Committee
of Unsecured Creditors of Teleglobe
Communications Corporation et al.

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CANADA

SUPERIOR

COURT

PROVINCE OF QUEBEC
DISTRICT OF MONTREAL
NO.:

IN THE MATTER OF:

TELEGLOBE COMMUNICATIONS
CORPORATION, TELEGLOBE
USA INC., OPTEL
TELECOMMUNICATIONS, INC.,
TELEGLOBE HOLDINGS (US)
CORPORATION, TELEGLOBE
MARINE (US) INC., TELEGLOBE
HOLDING CORP., TELEGLOBE
TELECOM CORPORATION,
TELEGLOBE INVESTMENT
CORP., TELEGLOBE
LUXEMBOURG LLC, TELEGLOBE
PUERTO RICO INC., and
TELEGLOBE SUBMARINE INC.

Debtors

TELEGLOBE COMMUNICATIONS
CORPORATION

-and-

TELEGLOBE USA INC.

-and-

OPTEL TELECOMMUNICATIONS,
INC.

-and-

TELEGLOBE HOLDINGS (US)
CORPORATION

-and-

TELEGLOBE MARINE (US) INC.

-and-

TELEGLOBE HOLDING CORP.

-and-

TELEGLOBE
CORPORATION

TELECOM

-and-

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TELEGLOBE INVESTMENT CORP.

-and-

TELEGLOBE LUXEMBOURG LLC.

-and-

TELEGLOBE PUERTO RICO INC.

-and-

TELEGLOBE SUBMARINE INC.

-and-

**THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF
TELEGLOBE COMMUNICATIONS
CORPORATION, et al.**

Plaintiffs

-v.-

BCE INC.

-and-

MICHAEL T. BOYCHUK

-and-

MARC A. BOUCHARD

-and-

SERGE FORTIN

-and-

TERENCE J. JARMAN

-and-

STEWART VERGE

-and-

JEAN C. MONTY

-and-

RICHARD J. CURRIE

-and-

THOMAS KIERANS

-and-

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STEPHEN P. SKINNER

-and-

ARNOLD STEINBERG

Defendants

LIST OF EXHIBITS

EXHIBIT P-1: Certified copy of the Order and Letter of Request;

Montreal, May 25, 2005

(s) KUGLER KANDESTIN, L.L.P.

KUGLER KANDESTIN, L.L.P.
Attorneys for Plaintiff Official Committee
of Unsecured Creditors of Teleglobe
Communications Corporation et al.

TRUE COPY

Kugler Kandestin, L.L.P.
Attorneys for Plaintiff Official Committee
of Unsecured Creditors of Teleglobe
Communications Corporation et al.

CANADA
PROVINCE OF QUEBEC
DISTRICT OF MONTREAL
NO.: 500-17-025908-057

SUPERIOR COURT
(Civil Division)

THIS 27th DAY OF May, 2005

PRESENT: THE HONOURABLE

Jean Fappier J.C.S.

IN THE MATTER OF:

TELEGLOBE COMMUNICATIONS
CORPORATION, TELEGLOBE USA
INC., OPTEL
TELECOMMUNICATIONS, INC.,
TELEGLOBE HOLDINGS (US)
CORPORATION, TELEGLOBE
MARINE (US) INC., TELEGLOBE
HOLDING CORP., TELEGLOBE
TELECOM CORPORATION,
TELEGLOBE INVESTMENT CORP.,
TELEGLOBE LUXEMBOURG LLC,
TELEGLOBE PUERTO RICO INC., and
TELEGLOBE SUBMARINE INC.

Debtors

TELEGLOBE COMMUNICATIONS
CORPORATION, TELEGLOBE USA
INC., OPTEL
TELECOMMUNICATIONS, INC.,
TELEGLOBE HOLDINGS (US)
CORPORATION, TELEGLOBE
MARINE (US) INC., TELEGLOBE
HOLDING CORP., TELEGLOBE
TELECOM CORPORATION,
TELEGLOBE INVESTMENT CORP.,
TELEGLOBE LUXEMBOURG LLC,
TELEGLOBE PUERTO RICO INC.,
TELEGLOBE SUBMARINE INC., and
the OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF
TELEGLOBE COMMUNICATIONS
CORPORATION, et al.;

Plaintiffs

Page 2

-v.-

BCE INC., MICHAEL T. BOYCHUK,
MARC A. BOUCHARD, SERGE
FORTIN, TERENCE J. JARMAN,
STEWART VERGE, JEAN C. MONTY,
RICHARD J. CURRIE, THOMAS
KIERANS, STEPHEN P. SKINNER,
and ARNOLD STEINBERG

Defendants

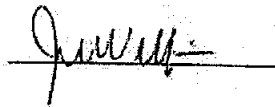
JUDGMENT

- [1] THE COURT, seized of the present Motion of the Official Committee of Unsecured Creditors of Teleglobe Communications Corporation, et al. for an Order to Appear for Examination and to Produce documents (the "Motion") pursuant to Article 9 and following of the *Special Procedure Act*, R.S.Q., c. P-27 (the "Act"), renders the present Judgment;
- [2] CONSIDERING the allegations contained in the Motion and the provisions of the Act;
- [3] CONSIDERING the Order and the Letter of Request issued on May 19, 2005 by the Honorable Sue L. Robinson, Chief Judge of the United States District Court, for the District of Delaware (Exhibit P-1);
- [4] CONSIDERING that the Motion is well founded both in fact and in law;
- [5] FOR THE FOREGOING REASONS:
- [6] GRANTS the present Motion;
- [7] ORDERS Claude Seguin (the "Witness") to appear before a duly appointed person capable of administering oaths or affirmations to give testimony by questions and answers upon oral deposition, at the offices of Kugler Kandestin, L.L.P., 1 Place Ville-Marie, Suite 2100, Montreal, Quebec, H3B 2C6, commencing at 9:30 a.m. on June 29, 2005 and/or on such other date that the Official Committee of Unsecured Creditors of Teleglobe Communications

Page 3

Corporation, et al. (the "Committee") and the Witness may agree and/or on such other date as the Court may otherwise fix (the "Deposition Date"), that such deposition continue from day to day until completed, and that the Witness receive from the Committee whatever witness fees, travel expenses, and other fees or payments may be payable to witnesses under the laws of Quebec (the "Witness Indemnity");

- [8] **ORDERS** that the delivery by the undersigned attorneys of a copy of the judgment to be rendered herein by Federal Express, addressed to John P. Amato, of Hahn & Hessen LLP, 488 Madison Avenue, New York, New York 10022, and George J. Wade and Daniel Schimmel, of Shearman & Sterling LLP, 599 Lexington Avenue, New York, New York 10022-6069, not less than thirty (30) days prior to the Deposition Date, shall constitute the advance notice pursuant to the Letter of Request (Exhibit P-1);
- [9] **ORDERS** that John P. Amato, of Hahn & Hessen LLP, 488 Madison Avenue, New York, New York 10022, Gregory V. Varallo, of Richards, Layton & Finger, P.O. Box 551, Wilmington, Delaware 19899, co-counsel for Plaintiffs, and George J. Wade and Daniel Schimmel, of Shearman & Sterling LLP, 599 Lexington Avenue, New York, New York 10022-6069, counsel for Defendants, as well as any other attorneys of the said law firms assisting the foregoing attorneys, be permitted to attend at and participate in the deposition;
- [10] **ORDERS** that a stenographic written record be made of the deposition by an official court reporter, and that the deposition be videotaped by a competent professional;
- [11] **ORDERS** the Witness to produce and deliver copies of the documents specified in Schedule "A" of the Letter of Request (Exhibit P-1) to Hahn & Hessen LLP, c/o Me Gordon Levine, Kugler Kandestin, L.L.P., 1 Place Ville-Marie, Suite 2100, Montreal, Quebec, H3B 2C6, no less than twenty-five (25) business days prior to the Deposition Date;
- [12] **ORDERS** that a copy of the deposition transcript, with all exhibits marked and attested, be returned to John P. Amato, Esq., Hahn & Hessen LLP, 488 Madison Avenue, New York, New York 10022, United States of America, under cover duly sealed and addressed to the Clerk of the United States District Court for the District of Delaware for return thereto;
- [13] **GIVES ACTE** to the undertaking from Kugler Kandestin, L.L.P. to pay, on behalf of the Committee, the Witness Indemnity to the Witness;
- [14] **THE WHOLE WITHOUT COSTS.**



CANADA

SUPERIOR

COURT

PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

NO.: 500-17-025909-055

IN THE MATTER OF:

TELEGLOBE COMMUNICATIONS
CORPORATION, TELEGLOBE
USA INC., OPTEL
TELECOMMUNICATIONS, INC.,
TELEGLOBE HOLDINGS (US)
CORPORATION, TELEGLOBE
MARINE (US) INC., TELEGLOBE
HOLDING CORP., TELEGLOBE
TELECOM CORPORATION,
TELEGLOBE INVESTMENT
CORP., TELEGLOBE
LUXEMBOURG LLC, TELEGLOBE
PUERTO RICO INC., and
TELEGLOBE SUBMARINE INC.

Debtors

TELEGLOBE COMMUNICATIONS
CORPORATION, a legal person
having a place of business at 11495
Commerce Park Drive, Reston,
Virginia, 20191;

-and-

TELEGLOBE USA INC., a legal
person having a place of business at
11495 Commerce Park Drive,
Reston, Virginia, 20191;

-and-

OPTEL TELECOMMUNICATIONS,
INC., a legal person having a place
of business at 11495 Commerce Park
Drive, Reston, Virginia, 20191;

-and-

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CORPORATION, a legal person
having a place of business at 11495
Commerce Park Drive, Reston,
Virginia, 20191;

-and-

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TELEGLOBE MARINE (US) INC.,
a legal person having a place of
business at 11495 Commerce Park
Drive, Reston, Virginia, 20191;

-and-

TELEGLOBE HOLDING CORP., a
legal person having a place of
business at 11495 Commerce Park
Drive, Reston, Virginia, 20191;

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**TELEGLOBE TELECOM
CORPORATION**, a legal person
having a place of business at 11495
Commerce Park Drive, Reston,
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TELEGLOBE INVESTMENT CORP.,
a legal person having a place of
business at 11495 Commerce Park
Drive, Reston, Virginia, 20191;

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TELEGLOBE LUXEMBOURG LLC,
a legal person having a place of
business at 11495 Commerce Park
Drive, Reston, Virginia, 20191;

-and-

TELEGLOBE PUERTO RICO INC.,
a legal person having a place of
business at 11495 Commerce Park
Drive, Reston, Virginia, 20191;

-and-

TELEGLOBE SUBMARINE INC., a
legal person having a place of
business at 11495 Commerce Park
Drive, Reston, Virginia, 20191;

-and-

**THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF
TELEGLOBE COMMUNICATIONS
CORPORATION, et al.**, c/o Messrs.
Hahn & Hessen LLP, 488 Madison
Avenue, New York, New York 10022;

Plaintiffs

-v.-

Page 3

BCE INC., a legal person having its principal place of business at 1000 de la Gauchetière West, suite 3700, Montreal, Quebec, H3B 4Y7;

-and-

MICHAEL T. BOYCHUK, domiciled and residing at 14 Magnolia, Baie d'Urfe, Quebec, H9X 3P4;

-and-

MARC A. BOUCHARD, domiciled and residing at 2878 Jean Gascon, St.-Laurent, Quebec, H4R 2T4;

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SERGE FORTIN, domiciled and residing at 1020 Boulevard l'Assomption, Repentigny, Quebec, J6A 5H5;

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TERENCE J. JARMAN, domiciled and residing at 2878 Jean Gascon, St.-Laurent, Quebec, H4R 2T4;

-and-

STEWART VERGE, domiciled and residing at 5 Edgehill Road, Toronto, Ontario, M9A 4N1;

-and-

JEAN C. MONTY, domiciled and residing at 1321 Sherbrooke Street West, Montreal, Quebec, H3G 1J4;

-and-

RICHARD J. CURRIE, domiciled and residing at 46A Chestnut Park Road, Toronto, Ontario;

-and-

THOMAS KIERANS, domiciled and residing at 4 Woodland Heights, Toronto, Ontario, M5S 1W8;

-and-

Page 4

STEPHEN P. SKINNER, domiciled
and residing at 50 Maxwell, Baie
d'Urfe, Quebec;

-and-

ARNOLD STEINBERG, domiciled
and residing at 4931 Glencairn
Avenue, Montreal, Quebec, H3B 4Y7;

Defendants

**MOTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
OF TELEGLOBE COMMUNICATIONS CORPORATION, et al. FOR AN
ORDER TO APPEAR FOR EXAMINATION AND TO PRODUCE DOCUMENTS**

(Art. 9 and following of the *Special Procedure Act*, R.S.Q., c. P-27)

**TO ONE OF THE HONOURABLE JUDGES OF THE SUPERIOR COURT,
SITTING IN CHAMBERS, IN AND FOR THE DISTRICT OF MONTREAL,
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF
TELEGLOBE COMMUNICATIONS CORPORATION, ET AL. RESPECTFULLY
STATES AS FOLLOWS:**

1. **THAT** by Order rendered on April 21, 2005 (the "Order"), the Honorable Sue L. Robinson, Chief Judge of the United States District Court, for the District of Delaware, granted a Motion filed by the Official Committee of Unsecured Creditors of Teleglobe Communications Corporation, et al. (the "Committee") seeking issuance of, *inter alia*, a Letter of Request to obtain the assistance of this Honorable Court in order to obtain the deposition and production of documents from Anna M. Coccia (the "Witness"), and issued a Letter of Request addressed to this Honorable Court; a certified copy of the Order and Letter of Request is produced herewith as **Exhibit P-1**;
2. **THAT** the Letter of Request relates to proceedings instituted by Plaintiffs (including the Committee) against Defendants, the whole as appears therefrom;
3. **THAT** the Letter of Request (Exhibit P-1) requests an Order of this Honourable Court to summon the Witness to appear before this Honourable Court or before a duly appointed person capable of administering an oath to give testimony by questions and answers upon oral deposition and to produce the documents identified and set forth in Schedule "A" of the Letter of Request;
4. The Witness' last known address is 5330 Bessborough Street, in the City of Montreal, Province of Quebec, and is therefore within the jurisdiction of this Honourable Court;
5. **THAT** it is in the interest of justice that this Honourable Court issue the orders sought by the Letter of Request;

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6. **THAT** the undersigned attorneys have undertaken to furnish the amounts necessary to ensure payment of witness fees, travel expenses, and other fees or payments that may be payable to the Witness under the laws of Quebec as a result of the present Motion;

7. **THAT** the present Motion is well-founded in fact and in law;

WHEREFORE, THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF TELEGLOBE COMMUNICATIONS CORPORATION, ET AL. PRAYS FOR JUDGMENT OF THIS HONOURABLE COURT:

GRANTING the present Motion;

ORDERING Anna M. Coccia (the "Witness") to appear before a duly appointed person capable of administering oaths or affirmations to give testimony by questions and answers upon oral deposition, at the offices of Kugler Kandestin, L.L.P., 1 Place Ville-Marie, Suite 2100, Montreal, Quebec, H3B 2C6, commencing at 9:30 a.m. on June 28, 2005 and/or on such other date that the Official Committee of Unsecured Creditors of Telelobe Communications Corporation, et al. (the "Committee") and the Witness may agree and/or on such other date as the Court may otherwise fix (the "Deposition Date"), that such deposition continue from day to day until completed, and that the Witness receive from the Committee whatever witness fees, travel expenses, and other fees or payments may be payable to witnesses under the laws of Quebec (the "Witness Indemnity");

ORDERING that the delivery by the undersigned attorneys of a copy of the judgment to be rendered herein by Federal Express, addressed to John P. Amato, of Hahn & Hessen LLP, 488 Madison Avenue, New York, New York 10022, and George J. Wade and Daniel Schimmel, of Shearman & Sterling LLP, 599 Lexington Avenue, New York, New York 10022-6069, not less than thirty (30) days prior to the Deposition Date, shall constitute the advance notice pursuant to the Letter of Request (Exhibit P-1);

ORDERING that John P. Amato, of Hahn & Hessen LLP, 488 Madison Avenue, New York, New York 10022, Gregory V. Varallo, of Richards, Layton & Finger, P.O. Box 551, Wilmington, Delaware 19899, co-counsel for Plaintiffs, and George J. Wade and Daniel Schimmel, of Shearman & Sterling LLP, 599 Lexington Avenue, New York, New York 10022-6069, counsel for Defendants, as well as any other attorneys of the said law firms assisting the foregoing attorneys, be permitted to attend at and participate in the deposition;

ORDERING that a stenographic written record be made of the deposition by an official court reporter, and that the deposition be videotaped by a competent professional;

ORDERING the Witness to produce and deliver copies of the documents specified in Schedule "A" of the Letter of Request (Exhibit P-1) to Hahn & Hessen LLP, c/o Me Gordon Levine, Kugler Kandestin, L.L.P., 1 Place Ville-Marie, Suite 2100, Montreal, Quebec, H3B 2C6, no less than twenty-five (25) business days prior to the Deposition Date;

ORDERING that a copy of the deposition transcript, with all exhibits marked and attested, be returned to John P. Amato, Esq., Hahn & Hessen LLP, 488 Madison Avenue, New York, New York 10022, United States of America, under cover duly sealed and addressed to the Clerk of the United States District Court for the District of Delaware for return thereto;

Page 6

GIVING ACTE to the undertaking from the undersigned attorneys to pay, on behalf of the Committee, the Witness Indemnity to the Witness;

ORDERING the provisional execution of the judgment to be rendered herein notwithstanding appeal;

THE WHOLE WITHOUT COSTS, SAVE IN THE EVENT OF CONTESTATION.

Montreal, May 25, 2005

(s) KUGLER KANDESTIN, L.L.P.

KUGLER KANDESTIN, L.L.P.
Attorneys for Plaintiff Official Committee
of Unsecured Creditors of Teleglobe
Communications Corporation et al.

TRUE COPY

Kugler Kandestin, L.L.P.
Attorneys for Plaintiff Official Committee
of Unsecured Creditors of Teleglobe
Communications Corporation et al.

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CANADA

SUPERIOR

COURT

PROVINCE OF QUEBEC
DISTRICT OF MONTREAL
NO.:

IN THE MATTER OF:

TELEGLOBE COMMUNICATIONS
CORPORATION, TELEGLOBE
USA INC., OPTEL
TELECOMMUNICATIONS, INC.,
TELEGLOBE HOLDINGS (US)
CORPORATION, TELEGLOBE
MARINE (US) INC., TELEGLOBE
HOLDING CORP., TELEGLOBE
TELECOM CORPORATION,
TELEGLOBE INVESTMENT
CORP., TELEGLOBE
LUXEMBOURG LLC, TELEGLOBE
PUERTO RICO INC., and
TELEGLOBE SUBMARINE INC.

Debtors

TELEGLOBE COMMUNICATIONS
CORPORATION

-and-

TELEGLOBE USA INC.

-and-

OPTEL TELECOMMUNICATIONS,
INC.

-and-

TELEGLOBE HOLDINGS (US)
CORPORATION

-and-

TELEGLOBE MARINE (US) INC.

-and-

TELEGLOBE HOLDING CORP.

-and-

TELEGLOBE TELECOM
CORPORATION

-and-

TELEGLOBE INVESTMENT CORP.

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-and-

TELEGLOBE LUXEMBOURG LLC.

-and-

TELEGLOBE PUERTO RICO INC.

-and-

TELEGLOBE SUBMARINE INC.

-and-

**THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF
TELEGLOBE COMMUNICATIONS
CORPORATION, et al.**

Plaintiffs

-v.-

BCE INC.

-and-

MICHAEL T. BOYCHUK

-and-

MARC A. BOUCHARD

-and-

SERGE FORTIN

-and-

TERENCE J. JARMAN

-and-

STEWART VERGE

-and-

JEAN C. MONTY

-and-

RICHARD J. CURRIE

-and-

THOMAS KIERANS

-and-

STEPHEN P. SKINNER

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-and-

ARNOLD STEINBERG

Defendants

LIST OF EXHIBITS

EXHIBIT P-1: Certified copy of the Order and Letter of Request;

Montreal, May 25, 2005

(s) KUGLER KANDESTIN, L.L.P.

KUGLER KANDESTIN, L.L.P.
Attorneys for Plaintiff Official Committee
of Unsecured Creditors of Teleglobe
Communications Corporation et al.

TRUE COPY

Kugler Kandestin, L.L.P.
Attorneys for Plaintiff Official Committee
of Unsecured Creditors of Teleglobe
Communications Corporation et al.

CANADA
PROVINCE OF QUEBEC
DISTRICT OF MONTREAL
NO.: 500-17-025909-055

SUPERIOR COURT
(Civil Division)

THIS 27th DAY OF May, 2005

PRESENT: THE HONOURABLE

Jean Frappier J.C.S.

IN THE MATTER OF:

TELEGLOBE COMMUNICATIONS
CORPORATION, TELEGLOBE USA
INC., OPTEL
TELECOMMUNICATIONS, INC.,
TELEGLOBE HOLDINGS (US)
CORPORATION, TELEGLOBE
MARINE (US) INC., TELEGLOBE
HOLDING CORP., TELEGLOBE
TELECOM CORPORATION,
TELEGLOBE INVESTMENT CORP.,
TELEGLOBE LUXEMBOURG LLC,
TELEGLOBE PUERTO RICO INC., and
TELEGLOBE SUBMARINE INC.

Debtors

TELEGLOBE COMMUNICATIONS
CORPORATION, TELEGLOBE USA
INC., OPTEL
TELECOMMUNICATIONS, INC.,
TELEGLOBE HOLDINGS (US)
CORPORATION, TELEGLOBE
MARINE (US) INC., TELEGLOBE
HOLDING CORP., TELEGLOBE
TELECOM CORPORATION,
TELEGLOBE INVESTMENT CORP.,
TELEGLOBE LUXEMBOURG LLC,
TELEGLOBE PUERTO RICO INC.,
TELEGLOBE SUBMARINE INC., and
the OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF
TELEGLOBE COMMUNICATIONS
CORPORATION, et al.;

Plaintiffs

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-v.-

BCE INC., MICHAEL T. BOYCHUK,
MARC A. BOUCHARD, SERGE
FORTIN, TERENCE J. JARMAN,
STEWART VERGE, JEAN C. MONTY,
RICHARD J. CURRIE, THOMAS
KIERANS, STEPHEN P. SKINNER,
and ARNOLD STEINBERG

Defendants

JUDGMENT

- [1] THE COURT, seized of the present Motion of the Official Committee of Unsecured Creditors of Teleglobe Communications Corporation, et al. for an Order to Appear for Examination and to Produce documents (the "Motion") pursuant to Article 9 and following of the *Special Procedure Act*, R.S.Q., c. P-27 (the "Act"), renders the present Judgment;
- [2] CONSIDERING the allegations contained in the Motion and the provisions of the Act;
- [3] CONSIDERING the Order and the Letter of Request issued on April 21, 2005 by the Honorable Sue L. Robinson, Chief Judge of the United States District Court, for the District of Delaware (Exhibit P-1);
- [4] CONSIDERING that the Motion is well founded both in fact and in law;
- [5] FOR THE FOREGOING REASONS:
- [6] GRANTS the present Motion;
- [7] ORDERS Anna M. Coccia (the "Witness") to appear before a duly appointed person capable of administering oaths or affirmations to give testimony by questions and answers upon oral deposition, at the offices of Kugler Kandestin, L.L.P., 1 Place Ville-Marie, Suite 2100, Montreal, Quebec, H3B 2C6, commencing at 9:30 a.m. on June 28, 2005 and/or on such other date that the Official Committee of Unsecured Creditors of Teleglobe Communications

Corporation, et al. (the "Committee") and the Witness may agree and/or on such other date as the Court may otherwise fix (the "Deposition Date"), that such deposition continue from day to day until completed, and that the Witness receive from the Committee whatever witness fees, travel expenses, and other fees or payments may be payable to witnesses under the laws of Quebec (the "Witness Indemnity");

- [8] **ORDERS** that the delivery by the undersigned attorneys of a copy of the judgment to be rendered herein by Federal Express, addressed to John P. Amato, of Hahn & Hessen LLP, 488 Madison Avenue, New York, New York 10022, and George J. Wade and Daniel Schimmel, of Shearman & Sterling LLP, 599 Lexington Avenue, New York, New York 10022-6069, not less than thirty (30) days prior to the Deposition Date, shall constitute the advance notice pursuant to the Letter of Request (Exhibit P-1);
- [9] **ORDERS** that John P. Amato, of Hahn & Hessen LLP, 488 Madison Avenue, New York, New York 10022, Gregory V. Varallo, of Richards, Layton & Finger, P.O. Box 551, Wilmington, Delaware 19899, co-counsel for Plaintiffs, and George J. Wade and Daniel Schimmel, of Shearman & Sterling LLP, 599 Lexington Avenue, New York, New York 10022-6069, counsel for Defendants, as well as any other attorneys of the said law firms assisting the foregoing attorneys, be permitted to attend at and participate in the deposition;
- [10] **ORDERS** that a stenographic written record be made of the deposition by an official court reporter, and that the deposition be videotaped by a competent professional;
- [11] **ORDERS** the Witness to produce and deliver copies of the documents specified in Schedule "A" of the Letter of Request (Exhibit P-1) to Hahn & Hessen LLP, c/o Me Gordon Levine, Kugler Kandestin, L.L.P., 1 Place Ville-Marie, Suite 2100, Montreal, Quebec, H3B 2C6, no less than twenty-five (25) business days prior to the Deposition Date;
- [12] **ORDERS** that a copy of the deposition transcript, with all exhibits marked and attested, be returned to John P. Amato, Esq., Hahn & Hessen LLP, 488 Madison Avenue, New York, New York 10022, United States of America, under cover duly sealed and addressed to the Clerk of the United States District Court for the District of Delaware for return thereto;
- [13] **GIVES ACTE** to the undertaking from Kugler Kandestin, L.L.P. to pay, on behalf of the Committee, the Witness Indemnity to the Witness;
- [14] **THE WHOLE WITHOUT COSTS.**

